

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TYLER CUMMINS,

Plaintiff,
15-CV-96 (NG)(PK)
-against-

CITY OF NEW YORK, et al.,

Defendants.

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**DECLARATION OF ROBERT MARINELLI IN SUPPORT OF
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS**

ROBERT MARINELLI declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I submit this Supplemental Declaration in furtherance of plaintiff's application for fees.
2. A significant amount of time was spent conferring and discussing case strategy with co-counsel. This total amount was 10.8 hours. I am willing to cut that time in half. Accordingly, I am reducing my bill by 5.4 hours.
3. I will not bill for the time spent conferring with co-counsel for the incorrectly calendared conference which would be a further .3 reduction.
4. In addition to the fees requested in my original declaration and the plaintiff's motion I am requesting to be compensated for the additional 11.2 hours expended working on the reply and declaration.

5. Of the 86.85 hours of work performed on this case, I seek compensation only for 81.15 hours.

6. My updated bill reflecting the time spent working on this reply is annexed as Exhibit 1.

Dated: New York, New York
 September 26, 2016

 /s
Robert Marinelli